

September 26, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, MD 20852

2629 99 OCT -1 12:40

RE: Docket Numbers: 98N-1230, 96P-0418, 97P-0197

To Whom It May Concern:

Each year the United States Egg Industry force molts (intentionally starves for up to 14 days) millions of hens to manipulate egg production. Forced molting is so stressful it destroys the hens' immune system, predisposing the birds and their eggs to salmonella infection. The United States Department of Agriculture's Food Safety and Inspection Service (FSIS) stated: "FSIS recognizes that public health concerns are raised by highly stressful forced molting practices. For example, extended starvation and water deprivation practices lead to increased shedding of Salmonella enteritidis (Se) by laying hens subjected to these practices."

The FDA has jurisdiction to ban farm practices that injure human health. Therefore, the FDA should ban the practice of forced molting because it has been scientifically shown to promote disease by destroying the starving hens' immune system. Forced molting of laying hens is the primary cause of infectious diseases in hens, eggs, and consumers of eggs. The FDA was petitioned in April 1998 to ban forced molting. This petition should be granted without further delay. Putting Bacteria warning labels on egg cartons and regulating refrigeration temperatures is not enough to ensure human safety.

Sincerely,

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97P-0197

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HEALTH AND HUMAN SERVICES  
FOOD AND DRUG ADMINISTRATION  
**CROSS REFERENCE SHEET**

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Docket Number/Item Code: 98N-1230/C735

See Docket Number/Item Code: 97P-0197/C736  
96P-0418/C735